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July 31, 2024

**Via PACER/ECF**

The Honorable Rukhsanah L. Singh, U.S.M.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Courtroom 7W  
Trenton, New Jersey

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices  
and Product Liability Litig., Case No. 3:16-md-2738 (MAS)/(RLS)***

Dear Judge Singh:

Our Firm represents Beasley Allen and Andy D. Birchfield, Jr., Esq. (together “Beasley Allen”) in the pending Motion to Disqualify before the Court. *See* ECF No. 28760. We are in receipt of J&J’s unsolicited letter filed earlier today. *See* ECF No. 33045. Upon receipt of the letter (and to avoid a letter-writing campaign), we contacted chambers to confirm whether the July 19, 2024 briefing schedule Your Honor ordered was still in effect. *See* ECF No. 32984. In the July 19, 2024 order, Your Honor ordered “that by no later than July 29, 2024, the parties to the Motion shall file supplementation of the Motion, showing cause why this Court should not adopt the State MCL’s findings of fact and conclusions of law. Any replies thereto shall be filed by no later than August 5, 2024.” *Id.* Both parties timely filed supplementation to the Motion as ordered. *See* ECF Nos. 33026; 33033.

In the interest of judicial efficiency, Beasley Allen submitted a brief letter arguing that the Court should adopt Judge Porto’s findings of fact and conclusions of law. *See* ECF No. 33033. The Court should adopt Judge Porto’s findings because J&J re-raises the identical arguments it has raised for months—which Judge Porto rightly rejected. *Id.* Consistent with the Court’s order,



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Beasley Allen will be submitting a substantive response to J&J's re-arguments by August 5, 2024. *See* ECF No. 32984. If the Court would like a substantive submission in advance of the August 5, 2024 deadline, Beasley Allen stands ready to respond.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ Jeffrey M. Pollock

JEFFREY M. POLLOCK

cc: All Counsel (*via* ECF)